



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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F.#2009R00768  
Disco.2

271 Cadman Plaza East  
Brooklyn, New York 11201

March 7, 2012

**BY ECF**

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Re: United States v. Gerardo P. Fusella, et al.  
Criminal Docket No. 11-844 (KAM)

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Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following discovery with respect to the above-captioned case.

The government is in possession of the documents set forth below. Please contact PANYNJ Investigator Jonathan Lax, (973) 565-4311, to arrange to inspect these items.

<b>Box No.</b>	<b>Description of Items</b>
80	Federal Motor Carriers' Safety Administration inspection documentation regarding Fusella Group;  Reports obtained from the Roseland and East Hanover, New Jersey police departments;  Internal Revenue Service Masterfile transcripts for Gerardo Fusella, Vincent Fusella, Fusella Group and Alpine Investment;  Printouts reflecting IRS Form W-2/1099 filings for Fusella Group (2007-2008) and Alpine Investment (2008);

Box No.	Description of Items
80 (Cont.)	Federal Tax Returns for Fusella Group (2007-2009) and Alpine Investment Group (2008-2009); and  Account records for Wachovia/Wells Fargo bank account no. 200058661321

The investigation of these defendants is ongoing. The government will produce any additional discovery required by Rule 16 of the Federal Rules of Criminal Procedure if and when it becomes aware of it. The government herein reiterates its demand for reciprocal discovery.

Please contact me if you have any questions.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: \_\_\_\_\_ /s/  
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c.c.: Clerk of the Court (KAM)